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June 11, 2020

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BY ECF

Honorable Ann M. Donnelly United States District Judge Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re: Galloway v. County of Nassau, et al., 19 CV 5026 (AMD) (JO)

Your Honor:

I represent plaintiff in the above-referenced matter. I write to respectfully request an adjustment of the briefing schedule in connection with Nassau County defendants' motion to dismiss at DE #62. Defendants consent to this request.

If it should please the Court, plaintiff may amend his pleading upon review of defendants' discovery responses.¹ This, in turn, may affect the pending motion to dismiss. The parties have conferred and plaintiff thus respectfully proposes the following revised briefing schedule for the Court's review and endorsement:

Nassau County defendants' deadline to re-assert their existing motion, answer the pleading or file a new motion:

August 24, 2020

Plaintiff's opposition due:

September 14, 2020

Nassau County defendants' reply, if any, due:

September 28, 2020

¹ By letter earlier today to the Hon. James Orenstein, plaintiff requested, on consent, that his Rule 16 amendment deadline be extended until August 3, 2020.

Hon. Ann M. Donnelly June 11, 2020

No previous request to adjust the briefing schedule has been submitted.

In light of the foregoing, plaintiff respectfully requests, on consent, that the Court review and adopt the proposed revised briefing schedule.

Thank you for your consideration of this request.

Respectfully submitted,

Gabriel P. Harvis

cc: Defense Counsel